

JUDGE SULLIVAN08 CV 6470
COPY

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 Attorneys for Plaintiff
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IN THE UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF NEW YORK

X

EVEREST NATIONAL INSURANCE COMPANY
 as subrogee of Bayard Views LLC/
 Bayard Views Condominium,
 20 Bayard Street
 Brooklyn, NY 11211,

CIVIL ACTION NO.

Plaintiff,

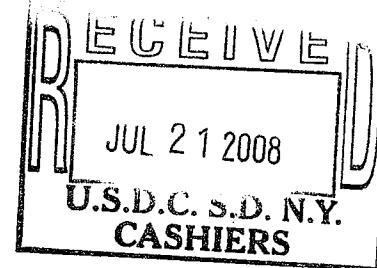
RULE 7.1 STATEMENT

v.

ADD PLUMBING, INC.
 122 Evergreen Avenue
 P.O. Box 110422
 Brooklyn, NY 11206

Defendant.

X



Pursuant to the Federal Rules of Civil Procedure 7.1 [formerly Local General Rule 1.9] and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Everest National Insurance Company (a non-governmental party), certifies that the following is the corporate parent of said party, which is publicly held.

EVEREST RE U.S. GROUP**SEE ATTACHED**

Date: July 18, 2008

John B. Galligan, Esquire (JBG-1589)
 COZEN O'CONNOR
 45 Broadway Atrium, 16th Floor
 New York, NY 10006
 212-509-9400

EVEREST RE U.S. GROUP

Directors: Martin Abrahams, Kenneth J. Duffy, John R. Dunne, Thomas J. Gallagher, William F. Galtney, Jr., Joseph V. Taranto (Chairman), John Weber, John A. Weber.

REGULATORY

An annual independent audit of the company is conducted by PricewaterhouseCoopers.

REINSURANCE PROGRAMS

Management purchases reinsurance if it believes that it is both prudent and cost effective to do so. The group participates in various excess of loss programs which cover specific risks such as excess workers' compensation, facultative property and excess property catastrophe coverage for risks outside of the U.S. The group also reduces its risk to some individual and aggregate losses through its participation in certain "common account" retrocessional arrangements.

At a corporate level, the group has fully utilized aggregate excess of loss contracts for the 1999, 2000 and 2001 accident years which covered all lines of business with limits of \$175 million, for each accident year, above a normalized statutory loss ratio threshold. These covers were net of inuring reinsurance protections and required that about half of the losses ceded be offset by additional premium charges.

In connection with the September 2000 acquisition of Mt. McKinley, Everest Re received an adverse development cover which protected the group for 80%, or \$160 million, of the first \$200 million of any adverse loss reserve development on the carried reserves of Mt. McKinley at September 19, 2000. At December 2003, this cover was fully utilized.

Everest Re Group

EVEREST RE U.S. GROUP

Dover, DE

Westgate Corporate Center, 477 Martinsville Road, Liberty Corner, NJ 07938-0830

Web: www.everestre.com

Fax: 908-604-3434

Tel: 908-604-3000

AMB#: 05696

Publicly Traded Corporation: Everest Re Group Ltd.

NYSE: RE

BEST'S RATING

Based on our opinion of the consolidated financial strength of the property/casualty members of Everest Re Group, which operate under a group structure, each group member is assigned a Best's Rating of A+ (Superior). The company is assigned the Financial Size Category of Class XV, which is the Financial Size Category of the group. Refer to the Preface for a complete explanation of Best's Rating system and procedure.

RATING RATIONALE

For a detailed discussion of the rating rationale, refer to the report of Everest Re Group.

Best's Rating: A+ g

Outlook: Stable

FIVE YEAR RATING HISTORY

Rating as of July 22, 2005: A+ g

	Best's Date	Rating	Best's Date	Rating
	06/17/05	A+ g	10/09/02	A+ g
	06/02/04	A+ g	04/12/02	A+ g
	06/20/03	A+ g	11/01/00	A+

KEY FINANCIAL INDICATORS (\$000)

Period Ending	Statutory Data				
	Direct Premiums Written	Net Premiums Written	Pretax Operating Income	Net Income	Total Admitted Assets
2000	223,759	751,624	240,726	181,301	4,876,659
2001	437,831	1,436,713	70,988	94,159	5,497,094
2002	844,044	2,231,897	224,052	75,350	6,364,961
2003	1,180,912	3,123,834	314,156	185,741	8,114,774
2004	1,257,046	2,961,518	295,069	188,626	9,399,327
5-Yr	1,257,046	2,961,518	295,069	188,626	9,399,327

Period Ending	Profitability			Leverage			Liquidity		
	Comb. Ratio	Inv. Yield (%)	Pretax ROR (%)	NA Inv.	NPW to PHS	Net Lev.	Liq. (%)	Oper. Cash flow (%)	Overall
2000	106.5	7.0	34.0	25.4	0.6	3.3	37.0	79.2	
2001	114.4	6.3	5.2	28.2	1.1	4.2	131.7	118.9	
2002	98.4	5.6	11.2	25.0	1.5	4.7	131.4	126.3	
2003	96.4	5.1	11.2	32.3	1.8	5.4	127.2	155.1	
2004	99.7	5.1	10.3	49.7	1.4	4.8	129.1	121.6	
5-Yr	101.0	5.7	11.8						

(*) Data reflected within all tables of this report has been compiled through the A.M. Best Consolidation of statutory filings. Within several financial tables of this report, this group is compared against the Professional Reinsurers.

For all tables within this report, all periods include the effects of Mt. McKinley Insurance Company which, in 2000, became part of the group and entered into a loss portfolio transfer with an offshore affiliate, Everest Reinsurance (Bermuda) Ltd., whereby \$480 million of carried loss reserves were transferred from the company for a premium of \$485 million.

CORPORATE STRUCTURE

AMB	COMPANY NAME	DOMICILE	% OWN
58455	<i>Everest Re Group Ltd.</i>	Bermuda	
87869	Everest Reinsurance Bermuda	Bermuda	100.00
86863	Everest International Reins	Bermuda	100.00
50016	<i>Everest Reins Holdings Inc</i>	DE	100.00
03519	Everest Reinsurance Company	DE	100.00
12096	Everest Indemnity Insurance Co	DE	100.00
87033	Everest Insurance Co Canada	Canada	100.00
02799	Everest National Insurance Co	AZ	100.00
50236	<i>Everest Re Holdings Ltd</i>	Bermuda	100.00
85570	Everest Re Ltd	United Kingdom	100.00
11197	Everest Security Insurance Co	GA	100.00
03777	Mt McKinley Insurance Company	DE	100.00

Year-End PHS

Period Ending

Period Ending